

CHARLES A. BONNER, ESQ. SB# 85413
A. CABRAL BONNER, ESQ. SB# 247528
LAW OFFICES OF BONNER & BONNER
475 GATE FIVE RD, SUITE 212
SAUSALITO, CA 94965
TEL: (415) 331-3070
FAX: (415) 331-2738
cbonner799@aol.com
cabral@bonnerlaw.com

ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**ALI SALEEM BEY and JOHN
MUHAMMAD BEY,**

Plaintiffs,

vs.

CITY OF OAKLAND, et al.,

Defendants

Case No: 14-cv-01626-JSC

**PROPOSED ORDER GRANTING
PLAINTIFF'S MOTION TO FILE
DOCUMENTS UNDER SEAL**

Plaintiffs **ALI SALEEM BEY** and **JOHN MUHAMMAD BEY** have filed with the Court a Motion to File Documents Under Seal and a Notice of Filing Sealed Documents. As set forth in Plaintiff's Motion to File Documents Under Seal, Plaintiff has lodged the following documents with this Court:

- a. Declaration of John Bey in Support of Plaintiff's Reply Brief [Doc. 131]
- b. Declaration of Ali Saleem Bey in Support of Plaintiff's Reply Brief [Doc. 132]
- c. Exhibit 27, Longmire DOJ Testimony

PROPOSED ORDER GRANTING PLAINTIFF'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
14-cv-01626-JSC

- d. Exhibit 28, Complaint Investigation Report, March 18, 2014;
- e. Exhibit 30, Joyner, DOJ Testimony
- f. Exhibit 33, Longmire DOJ Testimony
- g. Exhibit 35, Joyner, DOJ Testimony
- h. Exhibit 36, Joyner, DOJ Testimony
- i. Exhibit 38, Longmire DOJ Testimony
- j. Exhibit 39, Longmire DOJ Testimony
- k. Exhibit 40, DOJ Investigation of Longmire Cover
- l. Exhibit 41, Joyner, DOJ Testimony
- m. Exhibit 42, Joyner, DOJ Testimony

This motion is made on the basis that the exhibits to the Declaration of John M. Bey in Support of Plaintiff's Motion for Appointment of an Independent Investigator refer to exhibits that have been designated as "CONFIDENTIAL – Subject to Protective Order" by Defendant City of Oakland pursuant to the Protective Order [Docket No. 96] in this action. This request is narrowly tailored to seal only that material for which good cause to seal has been established.

IT IS SO ORDERED.

DATED: _____

Honorable Jacqueline Scott-Corley